

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:)	Case No. 21-61491
)	
Squirrels Research Labs LLC,)	Chapter 11
)	
Debtor.)	Judge Kendig
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Squirrels Research Labs LLC,)	
)	
Plaintiff,)	Adv. Pro. No. 22-6003
vs.)	
)	
Fleur-de-Lis Development, LLC, et al.,)	
)	
Defendants.)	

**MOTION FOR ENTRY OF ORDER ADMITTING BRITTANY P. STEPHEN
TO APPEAR *PRO HAC VICE***

Matthew T. Schaeffer, of the law firm of Bailey Cavalieri LLC, and being a member in good standing of the Bar of the State of Ohio and an attorney admitted to practice before the United States District Court for the Northern District of Ohio (the “Movant”), respectfully requests that this Court enter an order permitting Brittany P. Stephen, a lawyer of the law firm of Bailey Cavalieri LLC, to appear *pro hac vice* before this Court. Pursuant to Local Bankruptcy Rule 2090-1, Ms. Stephen is qualified to appear before this Court for the reasons set forth herein. This Motion is further supported by Ms. Stephen’s statement attached hereto as Exhibit A.

1. Bailey Cavalieri LLC is counsel for Defendant Fleur-de-Lis Development, LLC, Defendant Cynthia Heinz, and Defendant Rocco Piacentino (“Defendants”) in the above-captioned case. Ms. Stephen is a lawyer in the law firm of Bailey Cavalieri LLC located at 10 West Broad Street, Suite 2100, Columbus, Ohio 43215, (614) 229-3250 – telephone, bstephen@baileycav.com – e-mail.

2. Ms. Stephen is an attorney at law admitted to practice in, and is a member of good standing in the State of Ohio and in the State of Florida.

3. Ms. Stephen is not under suspension or disbarment from any Bar, and there are no pending grievances against Ms. Stephen.

4. Ms. Stephen submits to the disciplinary jurisdiction of this Court for any misconduct that occurs in this action.

WHEREFORE, the Movant respectfully requests that this Court enter an order admitting Brittany P. Stephen *pro hac vice* to appear before this Court on behalf of the Defendants with respect to the above-captioned adversary proceeding.

Respectfully submitted,

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer (0066750)
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Counsel for Defendant Fleur-de-Lis Development,
LLC, Defendant Cynthia Heinz, and Defendant
Rocco Piacentino

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Entry of Order Admitting Brittany P. Stephen to Appear Pro Hac Vice* was served electronically on the date of filing through the Court's ECF System on all ECF participants registered in this case at the email address registered with the court.

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer

EXHIBIT A

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Debtor.)	Judge Kendig
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Squirrels Research Labs LLC,)	
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Plaintiff,)	Adv. Pro. No. 22-6003
vs.)	
)	
Fleur-de-Lis Development, LLC, et al.,)	
)	
Defendants.)	

VERIFIED STATEMENT OF BRITTANY P. STEPHEN IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

I, Brittany P. Stephen, in support of the motion for my admission *pro hac vice*, state as follows:

1. I wish to appear and participate in the above-captioned matter, and any related proceedings, on behalf of Defendant Fleur-de-Lis Development, LLC, Defendant Cynthia Heinz, and Defendant Rocco Piacentino (the “Defendants”).
2. I am a lawyer in the law firm of Bailey Cavalieri LLC located at 10 West Broad Street, Suite 2100, Columbus, Ohio 43215, (614) 229-3250 – telephone, bstephen@baileycav.com – e-mail.
3. I am admitted in, and a member of good standing in the State of Ohio and in the State of Florida.

4. My privileges to practice law and my memberships in any bar associations have never been amended, modified, suspended, revoked, or otherwise limited in any way in any court, district, state, commonwealth, or other jurisdiction. There are no disciplinary actions pending against me.

5. I submit to the disciplinary jurisdiction of this Court for any misconduct that occurs in this action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 04/11/2022

/s/ Brittany P. Stephen
Brittany P. Stephen
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